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*Alaska Airlines*

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April 25, 2000

US Department of Transportation Dockets  
Docket No. FAA-I 999-6673 - 23  
400 Seventh Street SW  
Room Plaza 401  
Washington, DC 20590

REF: NPRM Certification of Screening Companies

Alaska Airlines respectfully submit these comments on the Department of Transportation's Notice of proposed Rulemaking on the Certification of Screening Companies contained in Docket No. FAA-I 999-6673; Notice 99-21.

Alaska Airlines generally supports the proposed Rulemaking intended to enhance all aspects of passenger and cargo screening. We concur the improvement in screening technology has and will continue to progress and that a more clearly defined standard security plan needs to be in place that will include the Screening Companies as full partners in aviation security. When the proposed rulemaking is incorporated into the regulation it will create many changes not yet fully discussed and or anticipated in the security-screening environment.

This Proposed Rulemaking will have a major economic impact on Alaska Airlines' long term conducting of business. Initially we will have to consider becoming a Certified Screening Company or the possibility of contracting this service at some of our smaller Alaska stations. At the present time Alaska Airlines conducts our own screening at these stations. Another economic impact will be the increase in charges that a new Certified Screening Company will pass onto the industry and any fees or charges that the FAA will propose for certification.

Alaska Airlines' concern is that the Government does not inadvertently create a cumbersome system of accountability that will make it more difficult for the new certified security partners through out the country.

Alaska Airlines disagrees with the FAA's stated proposal that enforcement action will be taken against both the air carrier and the screening company in all cases. This does not make the certified screening company fully accountable for their non-compliance when the air carrier has complied with the conditions of the Air Carrier Standard Security Program.

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Alaska Airlines supports the certification of screening companies but believes that the FAA should provide total oversight. Reason we recommend this is that the FAA not only certifies the screening company, they audit, test, provide the regulation governing their operation and approve the training of screeners.

REF: 111.1, 108.201, 109.203 and 129.25

Alaska Airlines has an interest in how screening companies as a group will address their concerns to the FAA. Air Carriers have Principal Security Inspectors (PSI) and major airports have Federal Security Managers (FSM). REF: 111.1

Alaska Airlines believes that the question of re-certification every five years would not be cost effective in that the screening companies will be closely audited and tested throughout this 5 year period. REF: 111.1

Alaska Airlines supports the enforcement of the interference with screening personnel however the specifics need to be more clearly detailed. What Law Enforcement Agency will be responsible for enforcement and how will this information be presented to the Agency? What actions would constitute interference? Is there a time frame for reporting these incidents? Most importantly how will the public become aware of this new ruling? REF: 111.9

Alaska Airlines recommends for expediency, that the distribution of FAA Security Directives to the screening companies be by the FAA. REF: 111.101

Alaska Airlines believes that one National Standard Security Program should be established, the Air Carrier Standard Security Program (ACSSP). The ACSSP should have a separate section for the conducting of screening and the screening company would be responsible to comply with those provisions. If another security program is established, it will create many different documents pertaining to passenger screening which now has duplicate information in the Airport Security Program and the ACSSP and therefore would not produce the expected national standard screening security. REF: 111.103, 111.105 and 111.107

Alaska Airlines is concerned that if a screening company fails to renew their certificate within the set time frame, how does the FAA propose to advise the air carriers of the fact that the company is no longer certified to conduct screening. REF: 111.109

The requirement of having copies of screening company operations specifications at each airport is an added cost and appears to be unnecessary. The FAA has this information as part of the certification process and a copy is available at the screening company corporate office.

REF: 111.113

Alaska Airlines contends that there is no provision for the FAA to advise the air carriers when the Administrator amends a screening company's operations specifications or security manual. It is suggested that this notification be accomplished electronically by the FAA. REF: 111.115

Alaska Airlines questions if the FAA would control the number of checkpoints a screening company may operate throughout the country and or at a specific airport. REF: 111.115

Alaska Airlines believes that FAA should electronically provide the air carriers with the complete enforcement record of a certified screening company. This would aid in selection process of a new company to represent the air carrier. REF: 111.117

Alaska Airlines has concern that FAR 109 Indirect Air Carrier testing the screening process will place an additional unnecessary layer of inspections and cause more individuals to impact the screening process. The scheduling and conducting of this testing would produce an administrative dilemma. REF: 111.117

Alaska Airlines believes that FAA should electronically provide the air carriers and the screening companies a listing of those Law Enforcement Agencies authorized to carry firearms onboard airplanes. REF: 111.201

Alaska Airlines believes that a Ground Security Coordinator is not in a position to fully determine an employee' capability to continue employment. This is the prerogative of management.

REF: 111.205 (a)(5)(d)

Alaska Airlines concurs an instructor must have actual screening experience, however the FAA has not yet described the FAA screener knowledge-based and performance testing standards for this position. The statement that the instructor receives a briefing regarding the objectives and standards of the course does not clarify who is to conduct this briefing.

REF: 111.211

Alaska Airlines concurs in the precept of a performance-based environment for determining capability of conducting screening in compliance with the regulations.

REF: 111.213

Alaska Airlines believes that the FAA work-together with the air carriers and the screening companies in developing a national training and testing programs. REF: 111.215

Alaska Airlines does not believe that the FAA should require an air carrier employee to monitor all testing. This will create a hardship and would require that the air carriers' hire specialized employees and would take away the element of unannounced testing.

REF: 111.215 (e)

Alaska Airlines believes that the transfer of records for filing should not be to the air carrier but to the FAA as the National Certification Record Source. The FAA should be the depository of all certification records so an employee could relocate to another part of the country and with any carrier. The original carrier for whom the employee worked may not operate in all parts of the country. The FAA should consider the records be electronically filed. REF: 111.221

Alaska Airlines strongly supports the use of and deployment of the Treat Image Projection Systems (TIP) By the FAA. It is important that there be a clearly defined procedure established as to how the testing will be utilized to establish performance based criteria for certification of screeners. REF: 111.223

Thank you for the opportunity to express Alaska Airlines concerns with the Proposed Rulemaking.

Sincerely

A handwritten signature in black ink, appearing to read "F. J. Hanulik". The signature is fluid and cursive, with the first name "F." and last name "Hanulik" clearly distinguishable.

F. J. Hanulik  
Manager, Aviation Security Compliance

cc: Ms Candace Ducharme - FAA  
Mr Richard Doubrava-ATA

Email <http://dms.dot.gov/>